

Internal Revenue Service  
Received

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Large Business  
and International**CONSENT TO EXTEND THE TIME TO  
ASSESS CIVIL PENALTIES PROVIDED BY  
31 U.S.C. § 5321 FOR FBAR VIOLATIONS**

WHEREAS, the parties to this agreement desire to extend the time during which the penalties provided by 31 U.S.C. 5321 may be assessed and collected,

WHEREAS, the parties to this agreement are aware that they have the right to refuse to sign this consent,

**Alexandru Bittner** \_\_\_\_\_

(name and taxpayer identification number)

United States person, \_\_\_\_\_

(address)

and the Commissioner of the Internal Revenue Service, hereby agree and consent to the following:

(1) For violations with respect to the requirement, established under 31 U.S.C. 5314, for a United States person to report having a financial interest in or signature authority, or other authority, over a financial account during the calendar years ending December 31, 2009 \_\_\_\_\_ that was maintained with a financial institution located in a foreign country, the amount of any penalty provided by 31 U.S.C. 5321 may be assessed at any time on or before December 31, 2016.

(2) This consent does not reduce, waive, or extend any period of limitation under 26 U.S.C. 6501 for assessing or collecting tax. This consent also does not supersede or amend any other agreement between the United States person and the Internal Revenue Service.

This consent does not serve to shorten the statutory period of time to assess any penalty under 31 U.S.C. 5321.

DateSignature of the United States Person

02/06/2016

Alex Bittner

DateSignature of Authorized Representative

\_\_\_\_\_

\_\_\_\_\_

DateSignature of the Commissioner's Delegate

3/2/2016

Janice Mearns  
Acting Group ManagerTitle**Government  
Exhibit**

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